

In The Matter Of:
JAMES D. SULLIVAN, et al. v.
SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION

EDWARD CANNING
April 24, 2018

COVERING ALL UPSTATE NEW YORK



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Min-U-Script® with Word Index

EXHIBIT

9

EDWARD CANNING

1

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF VERMONT

3
4 JAMES D. SULLIVAN and LESLIE ADDISON,
5 WILLIAM S. SUMNER, JR., RONALD S. HAUSTHOR,
6 GORDON GARRISON, and TED and LINDA CRAWFORD,
individually, and on behalf of a Class of
persons similarly situated,

7 Plaintiffs,

8
9 -against- Civil Action No.:
5:16-cv-000125-GWC

10

11 SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION,
12 Defendant.

13

14 Videotaped Deposition Of:

15 EDWARD CANNING

16 (Pursuant to Rule 30(b))

17

18 SUBJECT TO AN AGREED-UPON PROTECTIVE ORDER

19

20 DATE: April 24, 2018
TIME: 9:13 a.m. - 7:54 p.m.

21 HELD: HINKLEY ALLEN
22 30 South Pearl Street, Suite 901
Albany, New York 12207

23 BEFORE: Brenda J. O'Connor-Marello, CSR,
24 Certified Shorthand Reporter and
Notary Public in and for the
25 State of New York.

EDWARD CANNING

2

1 A P P E A R A N C E S:

2 APPEARING FOR THE PLAINTIFF(S) :

3 DAVIS & WHITLOCK, P.C.
21 Battery Park Avenue, Suite 206
4 Asheville, North Carolina 28801
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5 BY: GARY A. DAVIS, ESQ.
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6

7
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10 BY: EMILY J. JOSELSON, ESQ.
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14 APPEARING FOR THE DEFENDANT(S) :

15 QUINN EMANUEL URQUHART & SULLIVAN
51 Madison Avenue
16 New York, New York 10010
212-849-7000
17 BY: DOUGLAS E. FLEMING III, ESQ.
douglasfleming@quinnemanuel.com
18 -and-

19 BY: MARINA SCHWARZ, ESQ.
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20

21
22 Also Present:

23 David Freedman, Videographer
24
25

EDWARD CANNING

32

1 Q. -- as far as your responsibilities. One
2 is: Coordinate all aspects of EHS due
3 diligence as it concerns the acquisition
4 of new businesses in various regions of
5 the world.

6 Is that an accurate description of
7 some -- one of your responsibilities?

8 A. That would be accurate as it concerns
9 today's responsibilities.

10 Q. Okay. Next sentence was: Also
11 responsible for coordinating integration
12 of new businesses from EHS culture and
13 regulatory perspective. Does that ring
14 true?

15 A. Yes, it does.

■ ■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]

EDWARD CANNING

33

Category	Sub-category	Value
Category 1	Sub-category 1.1	85
	Sub-category 1.2	90
	Sub-category 1.3	88
	Sub-category 1.4	45
Category 2	Sub-category 2.1	85
	Sub-category 2.2	80
	Sub-category 2.3	95
Category 3	Sub-category 3.1	25
	Sub-category 3.2	30
Category 4	Sub-category 4.1	35
	Sub-category 4.2	70
Category 5	Sub-category 5.1	20
	Sub-category 5.2	35
Category 6	Sub-category 6.1	40
	Sub-category 6.2	25
Category 7	Sub-category 7.1	30
	Sub-category 7.2	35
Category 8	Sub-category 8.1	25
	Sub-category 8.2	65
Category 9	Sub-category 9.1	85
	Sub-category 9.2	30
Category 10	Sub-category 10.1	20
	Sub-category 10.2	45
Category 11	Sub-category 11.1	50
	Sub-category 11.2	70

EDWARD CANNING

34

[illegible]

EDWARD CANNING

35

21 Q. What is due diligence, by the way?

22 A. Typically it's in the context of the
23 environmental health and safety function.
24 It would be an attempt to determine if
25 there are environmental liabilities, so

EDWARD CANNING

36

1 contaminated soils; in the case of a stock
2 purchase, were there prior sites; what was
3 the history of the prior sites, so
4 determine what exposures and -- from a
5 liability standpoint. Also, what are the
6 health and safety conditions like in the
7 interior of a plant? So it's -- it's dual
8 purpose to -- to find what liabilities
9 might exist. And also, from a planning
10 standpoint, post-acquisition, what sort of
11 work will need to be done in some sort of
12 prioritized manner to address concerns
13 that relate to employee safety and health?

14 Q. Does it include environmental matters
15 outside the plant fence as well? I can
16 be --

17 | A. Well --

18 Q. -- more specific if you want.

19	A. Sure.
----	----------

20 Q. Does it include compliance with permits
21 for air pollution, for instance?

22 A. Absolutely. It would -- it would include
23 that, yes.

EDWARD CANNING

37

Category	Sub-category	Value
Category 1	Sub-category 1.1	85
	Sub-category 1.2	78
	Sub-category 1.3	30
Category 2	Sub-category 2.1	65
	Sub-category 2.2	15
Category 3	Sub-category 3.1	82
	Sub-category 3.2	18
Category 4	Sub-category 4.1	15
	Sub-category 4.2	15
Category 5	Sub-category 5.1	30
	Sub-category 5.2	65
Category 6	Sub-category 6.1	30
	Sub-category 6.2	70
Category 7	Sub-category 7.1	80
	Sub-category 7.2	85
Category 8	Sub-category 8.1	15
	Sub-category 8.2	65
Category 9	Sub-category 9.1	75
	Sub-category 9.2	45
Category 10	Sub-category 10.1	85
	Sub-category 10.2	40
Category 11	Sub-category 11.1	85
	Sub-category 11.2	70
Category 12	Sub-category 12.1	85
	Sub-category 12.2	30
Category 13	Sub-category 13.1	55
	Sub-category 13.2	75

EDWARD CANNING

38

[illegible]

EDWARD CANNING

39

[illegible]

EDWARD CANNING

40

[illegible]

EDWARD CANNING

41

Category	Item	Value
Category 1	Item 1.1	100
	Item 1.2	50
	Item 1.3	150
Category 2	Item 2.1	200
	Item 2.2	100
	Item 2.3	150
Category 3	Item 3.1	100
	Item 3.2	150
	Item 3.3	100
Category 4	Item 4.1	150
	Item 4.2	100
	Item 4.3	150
Category 5	Item 5.1	100
	Item 5.2	150
	Item 5.3	100
Category 6	Item 6.1	150
	Item 6.2	100
	Item 6.3	150
Category 7	Item 7.1	100
	Item 7.2	150
	Item 7.3	100
Category 8	Item 8.1	150
	Item 8.2	100
	Item 8.3	150
Category 9	Item 9.1	100
	Item 9.2	150
	Item 9.3	100
Category 10	Item 10.1	150
	Item 10.2	100
	Item 10.3	150
Category 11	Item 11.1	100
	Item 11.2	150
	Item 11.3	100
Category 12	Item 12.1	150
	Item 12.2	100
	Item 12.3	150
Category 13	Item 13.1	100
	Item 13.2	150
	Item 13.3	100
Category 14	Item 14.1	150
	Item 14.2	100
	Item 14.3	150
Category 15	Item 15.1	100
	Item 15.2	150
	Item 15.3	100

EDWARD CANNING

58



2 Q. Okay. Do you consider yourself an
3 industrial hygienist?

4	A. I do not.
---	--------------

5 Q. Do you consider yourself a toxicologist?

6	A. No.
---	--------

[illegible]

--	--	--

[illegible]

--	--	--

--	--	--

--	--	--

--	--	--

--	--	--

[illegible]

[illegible]

EDWARD CANNING

59

[illegible]

EDWARD CANNING

60

[illegible]

EDWARD CANNING

61

[illegible]

EDWARD CANNING

63

[REDACTED]

9 Q. Okay.

10 MR. DAVIS: We've been going
11 about an hour. Why don't we take a
12 short break.

13 MR. FLEMING: Sure.

14 VIDEOGRAPHER: The time is
15 10:20. We are off the record.

16 * * *

17 (A brief recess was taken.)

18 * * *

19 VIDEOGRAPHER: Time is 10:30.
20 We're on the record.

21 BY MR. DAVIS:

22 Q. Are you ready to proceed, Mr. Canning?

23 A. Yes, I am.

24 Q. Okay. Thanks.

[REDACTED]

EDWARD CANNING

64

[illegible]

EDWARD CANNING

65

[illegible]

EDWARD CANNING

66

Category	Item	Value
Category 1	Item 1.1	100
	Item 1.2	50
	Item 1.3	150
Category 2	Item 2.1	120
	Item 2.2	110
	Item 2.3	110
Category 3	Item 3.1	180
	Item 3.2	160
	Item 3.3	30
	Item 3.4	170
	Item 3.5	180
Category 4	Item 4.1	100
	Item 4.2	100
	Item 4.3	140
Category 5	Item 5.1	160
	Item 5.2	140
	Item 5.3	100
Category 6	Item 6.1	120
	Item 6.2	120
	Item 6.3	160
Category 7	Item 7.1	100
	Item 7.2	100
	Item 7.3	140
Category 8	Item 8.1	120
	Item 8.2	140
	Item 8.3	160
Category 9	Item 9.1	100
	Item 9.2	100
	Item 9.3	140
Category 10	Item 10.1	120
	Item 10.2	140
	Item 10.3	160

EDWARD CANNING

67

[illegible]

EDWARD CANNING

68

[illegible]

EDWARD CANNING

69

[illegible]

EDWARD CANNING

76

[illegible]

EDWARD CANNING

77

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q. So do you believe a responsible company,
11 upon being notified by Du Pont of a
12 particular health issue caused by APFO,
13 would -- would inform the state agency
14 about that?

15 MR. FLEMING: Objection to form.

16 A. But that's -- you're speaking in, I take
17 it, hypothetical terms here.

18 Q. Kind of, I am.

19 A. So --

20 MR. FLEMING: Objection to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EDWARD CANNING

96

[illegible]

EDWARD CANNING

99

1

* * *

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18

MR. FLEMING: Objection to form.

19

And the witness is entitled to review

20

the document again if you're going to

21

be asking him questions.

22

MR. DAVIS: I will. I will give

23

him time.

24

* * *

25

(Pause for review of [Exhibit 4.](#))

EDWARD CANNING

100

1 * * *

2 BY MR. DAVIS:

3 Q. Let me know when you're ready.

4 A. Okay. I'm ready. I don't recall ever
5 having seen this document before.

6 Q. The -- just so -- I want to point your
7 attention to two sentences here. One is
8 the second sentence that says: Current
9 permit data indicates that the facility is
10 operating at 10 percent of the AGC for
11 ammonium perfluorooctanoate.

[REDACTED]

EDWARD CANNING

112

[illegible]

EDWARD CANNING

113

[illegible]

EDWARD CANNING

114

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 * * *

[REDACTED]

[REDACTED]

11 * * *

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 * * *

[REDACTED]

21 * * *

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EDWARD CANNING

115

[illegible]

EDWARD CANNING

122

[illegible]

EDWARD CANNING

123

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

EDWARD CANNING

124

[illegible]

EDWARD CANNING

125

[illegible]

EDWARD CANNING

126

23

* * *

EDWARD CANNING

127

1

* * *

[illegible]

EDWARD CANNING

128

[illegible]

EDWARD CANNING

129

[illegible]

EDWARD CANNING

130

[illegible]

EDWARD CANNING

131

25

* * *

EDWARD CANNING

135

25

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EDWARD CANNING

136

[illegible]

EDWARD CANNING

137

[illegible]

EDWARD CANNING

138

[illegible]

EDWARD CANNING

139

25

EDWARD CANNING

140

[illegible]

EDWARD CANNING

141

[illegible]

EDWARD CANNING

141

[illegible]

EDWARD CANNING

153

[illegible]

EDWARD CANNING

153

[illegible]

EDWARD CANNING

154

[illegible]

EDWARD CANNING

167

[illegible]

EDWARD CANNING

189

1 your answer, Mr. Canning?

2 A. So there were -- there was information
3 provided by suppliers to, you know,
4 technical personnel, who would have been,
5 for example, Ruth Jamke and others like
6 her that were frequently interacting with
7 suppliers. There was that information
8 that was conveyed. There's probably
9 additional information that I'm just not
10 privy to or aware of. But we did find
11 that the actual concentrations during that
12 period were much lower than 5,000 parts
13 per million.

14 MR. DAVIS: He needs to take a
15 break.

16 VIDEOGRAPHER: Time is 2:14.
17 We're off the record.

18 * * *

19 (A brief recess was taken.)

20 * * *

21 VIDEOGRAPHER: The time is 2:19.

22 DVD 3.

23 BY MR. DAVIS:

24 Q. Mr. Canning, you had suggested that you
25 had gotten back some data from suppliers

EDWARD CANNING

190

11

* * *

EDWARD CANNING

191

[illegible]

EDWARD CANNING

192

7

* * *

10

* * *

EDWARD CANNING

236

Age Group	Percentage
18-24	85%
25-34	75%
35-44	88%
45-54	82%
55-64	86%
65-74	62%
75-84	100%
85-94	88%
95-104	80%

17

* * *

<p> <input type="checkbox"/> </p> <p> <input type="checkbox"/> </p>	<p> <input type="checkbox"/> </p> <p> <input type="checkbox"/> </p>
---	---

20

* * *

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

EDWARD CANNING

237

[illegible]

EDWARD CANNING

238

[illegible]

EDWARD CANNING

244

1

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EDWARD CANNING

245

[illegible]

EDWARD CANNING

246

[illegible]

EDWARD CANNING

247

13

* * *

16

* * *

EDWARD CANNING

248

[illegible]

EDWARD CANNING

249

[illegible]

EDWARD CANNING

258

■ [REDACTED]
■ [REDACTED]
3 Q. And I asked you -- I think it had to do
4 with 3M's announcement. And do you recall
5 that announcement being in May of 2000?

6 A. I don't remember that.

7 Q. Let me show you a letter from 3M to
8 CHEMFAB.

9 MR. DAVIS: And we'll make this
10 [Exhibit 27](#).

11 * * *

12 ([Exhibit 27](#) herein was marked for
13 identification.)

14 * * *

15 BY MR. DAVIS:

16 Q. And you'll see -- the Bates stamp on this
17 is a 3M Bates stamp because we also
18 received documents from 3M in this case --

19 A. Okay.

20 Q. -- as well as other cases.

■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

EDWARD CANNING

259

Category	Value
Category 1	Value 1.1
Category 2	Value 2.1
Category 3	Value 3.1
Category 4	Value 4.1
Category 5	Value 5.1
Category 6	Value 6.1
Category 7	Value 7.1
Category 8	Value 8.1
Category 9	Value 9.1
Category 10	Value 10.1

7 Q. So I don't have the May 17th, 2000 letter
8 that's referenced here to talk about
9 phaseout plans for PFOA products, but this
10 letter -- you can take whatever time you
11 need to review it. It does refer to the
12 phaseout of 3M products containing PFOA,
13 does it not?

14 A. Yes, it seems to. Yes.

Response	Percentage Range
U.S. should take action	75% - 95%
U.S. should not take action	5% - 25%

EDWARD CANNING

260

[illegible]

EDWARD CANNING

261

Category	Item	Value
Category 1	Item 1.1	95
	Item 1.2	98
	Item 1.3	100
	Item 1.4	45
Category 2	Item 2.1	92
	Item 2.2	88
	Item 2.3	87
	Item 2.4	15
Category 3	Item 3.1	75
	Item 3.2	55
	Item 3.3	52
	Item 3.4	10
Category 4	Item 4.1	94
	Item 4.2	65
	Item 4.3	100
	Item 4.4	68
Category 5	Item 5.1	88
	Item 5.2	85
	Item 5.3	35
	Item 5.4	75
Category 6	Item 6.1	70
	Item 6.2	65
	Item 6.3	10
	Item 6.4	85
Category 7	Item 7.1	80
	Item 7.2	75
	Item 7.3	15
	Item 7.4	85
Category 8	Item 8.1	85
	Item 8.2	55
	Item 8.3	10
	Item 8.4	95

EDWARD CANNING

262

Category	Sub-category	Value
Category 1	Sub-category 1.1	10
	Sub-category 1.2	25
	Sub-category 1.3	15
	Sub-category 1.4	35
	Sub-category 1.5	30
	Sub-category 1.6	28
	Sub-category 1.7	32
	Sub-category 1.8	33
	Sub-category 1.9	31
	Sub-category 1.10	18
Category 2	Sub-category 2.1	15
	Sub-category 2.2	20
	Sub-category 2.3	22
	Sub-category 2.4	25
	Sub-category 2.5	28
Category 3	Sub-category 3.1	30
	Sub-category 3.2	10
	Sub-category 3.3	35
	Sub-category 3.4	10
	Sub-category 3.5	30
	Sub-category 3.6	15
	Sub-category 3.7	20
	Sub-category 3.8	25
	Sub-category 3.9	30
	Sub-category 3.10	20
Category 4	Sub-category 4.1	10
	Sub-category 4.2	25
	Sub-category 4.3	15
	Sub-category 4.4	35
	Sub-category 4.5	30

EDWARD CANNING

263

Category	Item	Value
Category 1	Item 1.1	100
	Item 1.2	100
	Item 1.3	100
	Item 1.4	100
Category 2	Item 2.1	100
	Item 2.2	100
	Item 2.3	100
	Item 2.4	100
Category 3	Item 3.1	100
	Item 3.2	100
	Item 3.3	100
	Item 3.4	100
Category 4	Item 4.1	100
	Item 4.2	100
	Item 4.3	100
	Item 4.4	100
Category 5	Item 5.1	100
	Item 5.2	100
	Item 5.3	100
	Item 5.4	100
Category 6	Item 6.1	100
	Item 6.2	100
	Item 6.3	100
	Item 6.4	100
Category 7	Item 7.1	100
	Item 7.2	100
	Item 7.3	100
	Item 7.4	100
Category 8	Item 8.1	100
	Item 8.2	100
	Item 8.3	100
	Item 8.4	100
Category 9	Item 9.1	100
	Item 9.2	100
	Item 9.3	100
	Item 9.4	100
Category 10	Item 10.1	100
	Item 10.2	100
	Item 10.3	100
	Item 10.4	100

23 Q. There are hundreds of studies that were
24 placed in the administrative records,
25 which was AR-226. Do you recall that?

EDWARD CANNING

264

1 A. I do not, I'm afraid.

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 Q. Did you, yourself -- and let me back up
15 just one second.

16 The EPA process, do you recall it
17 being called a "product stewardship
18 process"?

19 A. I have some sort of vague recollection
20 about that, later on, at least. Like, at
21 which time period are you referring to,
22 like '05 or after?

23 Q. Well, 2002 up to 2006.

24 A. Okay.

25 Q. Do you recall that being the time --

EDWARD CANNING

269

[illegible]

EDWARD CANNING

270

[illegible]

EDWARD CANNING

271

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 BY MR. DAVIS:

9 Q. Is that a yes?

10 A. Well, I do recall reading about -- I
11 believe that's the Little Hocking --

12 Q. Yes.

13 A. Yes, I do.

14 Q. And was that in the 2003 time frame?

15 MR. FLEMING: Objection to form.

16 A. I have no idea when that was. I mean, it
17 became an infamous situation. I don't
18 remember when I first heard about that.

19 Q. Certainly it was known in the industry
20 around the time that it became public.

21 A. It was all in the papers and -- yeah.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EDWARD CANNING

272

[REDACTED]

EDWARD CANNING

273

3

* * *

6

* * *

EDWARD CANNING

274

[illegible]

EDWARD CANNING

275

[illegible]

* * *

* * *

EDWARD CANNING

285

[illegible]

24 Q. Isn't it true that the first testing was
25 done in August of 2014 which detected PFOA

EDWARD CANNING

286

1 | in the village water supply?

2 A. I don't have a specific recollection of
3 when the village tested their water
4 initially.

[illegible]

EDWARD CANNING

287

12 MR. FLEMING: Could you let us
13 know how much time we're on the
14 record?

15 VIDEOGRAPHER: Sure. We are
16 almost six hours.

17 MR. FLEMING: Okay. I will
18 remind you, Gary, we will have some
19 direct; so allow that into your
20 allotment of time.

21 MR. DAVIS: Okay. We're going
22 to take our seven hours.

23 What was the last exhibit,
24 please?

25 COURT REPORTER: Thirty-one.

EDWARD CANNING

288

1 * * *

2 ([Exhibit 32](#) herein was marked for
3 identification.)

4 * * *

5 BY MR. DAVIS:

6 Q. Let me show you what we've marked as
7 [Exhibit 32](#). This is a letter from David
8 Sarvadi with Keller and Heckman, LLP,
9 counsel to Saint-Gobain to the EPA, TSCA
10 Confidential Business Information in
11 Washington, D.C. dated December 30th,
12 2014.

13 Is this the letter that we were
14 just discussing that informed the EPA
15 about the contamination in Hoosick Falls?

16 A. Can I take a moment --

17 Q. Yes.

18 A. -- just to quickly look at it? It's been
19 some time since I've seen this.

20 * * *

21 (Pause for review of [Exhibit 32](#).)

22 * * *

23 THE WITNESS: Okay.

24 BY MR. DAVIS:

25 Q. Yes?

EDWARD CANNING

289

1 | A. This is it, yes.

[illegible]

EDWARD CANNING

290

[illegible]

EDWARD CANNING

291

[illegible]

EDWARD CANNING

292

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

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